

DEPARTMENT OF THE AIR FORCE HEADQUARTERS 380TH COMBAT SUPPORT GROUP (SAC) PLATTSBURGH AIR FORCE BASE, NEW YORK 12903

REPLY TO ATTN OF: α

10 FEB 1986

SUBJECT:

EPA Request for Information Concerning York Oil Facility (Your Ltr. 23 Jan 86)

To: U.S. Environmental Protection Agency Site Investigation and Compliance Branch ATIN: Mr. Peter Flynn Region 11, Room 737 26 Federal Plaza New York, New York 10278

- The base's response to your request for information has been completed to the best of our ability and is attached (see attachment 1). In general, very little information was immediately available to answer your questions. A search for additional information has begun and will be forwarded to you as soon as it is received.
- 2. Any questions or concerns can be addressed to the Deputy Civil Engineer, Mr. John Huru, at (518) 565-6205.

ICKS, Colonel, USAF

Commander

- 1. Questionnaire Response
- Records Request Letter
- 3. Certification-



DEPARTMENT OF THE AIR FORCE HEADQUARTERS 380TH COMBAT SUPPORT GROUP (SAC) PLATTSBURGH AIR FORCE BASE, NEW YORK 12903-5000

REPLY TO ATTN OF:

CC

10 FEB 1986

SUBJECT:

Request for Information

Environmental Directorate

DRMS-H

Battle Creek, Michigan 49016

- 1. The base has been requested by the Environmental Protection Agency (EPA) to provide information on past disposal practices involving waste oils, lubricants, and polychlorinated biphenyls (PCBs) during a period from 1955 to 1979. According to our records, disposal operations were assumed by your agency in 1973. It is during the period of 1973 to 1979 that your assistance is requested in identifying past disposal practices.
- 2. Specific information needed to reply to the EPA request is presented as follows:
- a. Provide a list of all PCB items such as transformers, regulators, switches, and capacitors that were disposed of through the Property Disposal Office (PDO) during 1973 to 1979. Include the names and addresses of any transporters used to ship these items, the final destination of these items, and dates of removal.
- b. Provide a list of all waste oils and lubricants that were disposed of through the PDO during 1973 to 1979. Include the names and addresses of any transporters used to ship these items, the final destination of these items, and dates of removal.
- 3. This request for information has been discussed per 3 Feb 86 telecon between Mr. John Ross, DRMS-OA, and the base environmental engineer, Mr. Dominic Fontana. Any information you can supply in regard to this EPA request would be appreciated. Our point of contact for this information is Mr. John Huru, 380 CSG/DE, Plattsburgh AFB NY 12903-5000, AV 689-6205.

GARY L. HICKS, Colonel, USAF

Commander

QUESTIONNAIRE RESPONSE

- Ques: 1. Describe in detail, all processes of your facility which generated waste oils and lubricants during the years 1950 to 1979.
- a. Include the principal components as well as the source and volume of these waste oils and lubricants generated, per year.
 - b. Include diagrams, if necessary.

Ans: 1. The base became operational in July of 1955. No records exist for the period of 1955-1979 on management and disposal of base-generated waste oils and lubricants. Since present operations have not changed significantly since the 1955-1979 period, it is assumed that current records are a reasonable estimator of past activities. All waste oils and lubricants are generated from routine maintenance activities. The following data is based on current records:

Generating Activity 1. Field Maintenance Squadron	Waste <u>Product</u>	Principal Components	Annual Quantity Generated
a. Propulsion Branch	hydraulic fluid purging fluid motor oil motor oil	mineral oil petro base petro base synthetic base	180 gallons 120 gallons 180 gallons 660 gallons
b. Nondestruct Inspection Lab.	dye penetrant emulsifier motor oil	petro base petro base petro base	120 gallons 120 gallons 120 gallons
c. Aerospace Systems Branch	hydraulic fluid lube oil	mineral oil petro base	60 gallons 75 gallons
2. Munition Maint. Sq. Equipment Maintenance	hydraulic fluid	mineral oil	108 gallons
3. Auto Hobby Shop	motor oil	petro base	1,800 gallons
4. Air Rescue Sq.	hydraulic fluid motor oil	mineral oil petro base	120 gallons 120 gallons
5. Transportation Sq. a. General Purpose Repair	motor oil	petro base	2,400 gallons
b. Refueling Vehicle Maintenance	motor oil	petro base	1,800 gallons
c. Heavy Equipment	motor oil	petro base	2,400 gallons
6. Base Service . Station	motor oil	petro base	1,400 gallons
Tota	11,783 gallons		

Ques: 2. Provide a list of the sources, volume and composition of any materials on site between the years 1950 to 1979 which contained polychlorinated biphenyls at your site.

Ans: 2. Sources of PCBs on site during 1955 to 1979 consisted of dielectric fluids used in electrical distribution equipment such as transformers, capacitors, and switches. No records exist that document the actual PCB items that were used on site during 1955 to 1979. The current inventory and records of disposal from 1982 are presented below, and it is assumed that these PCB items were maintained on site from 1955 to 1979.

<u>Item</u>	Number	PCB Concentration (PPM)	Quantity (Gal)	Status
Transformers Switches & Regulator	49 8	50 to 500 50 to 500	2,543 470	In-service In-service
Transformers Regulator	17 1	500 or greater 500 or greater	1,016 6	In-service In-service
Transformer	22	500 or greater*	964	Disposed of since 1982
Capacitors	5	500 or greater*	80	Disposed of since 1982

^{*} assumed to contain over 500 ppm PCBs.

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Ques: 3. Provide a list of the sources, volume, and composition of any materials removed off-site between the years 1950 to 1979 which may contain polychlorinated biphenyls.

- a. Provide a list identifying all records and documents pertaining to the off-site shipment of these materials. If no such documentation exists, please explain why.
- b. Indicate the final destination of these materials and the dates of removal.
- c. Provide the names and addresses of any transporters who may have been used to remove these materials off-site and the respective source, volume and composition of the materials they removed.
- Ans: 3. No records are available at this base that will provide information on disposal of PCB items prior to 1982. PCB items such as transformers, switches, etc., when removed from service, were turned over to the base disposal office. From 1973 to the present, the disposal office has been managed by the Defense Reutilization and Marketing Office (DRMO), a Defense Logistics Agency. DRMO is responsible for the disposal of PCB items by contract. All local DRMO records from 1973 to 1979 were retired and sent to DRMO's regional office in Battle Creek, Michigan. The base has requested a records search in order to obtain the information. See attached copy of Combat Support Group Commander letter, attachment 2.

From 1955 to 1973, the disposal office was an Air Force run operation. No records are available for this period, although research is continuing.

- Ques: 4. Identify the source, composition and volume of any waste oils and lubricants removed by Peirce Oil Company (also known as Peirce Oil Company, York Oil Company, Inc., Peirce Oil Service, Peirce Brothers Oil Service and Kenneth Peirce Oil Service), its agents, employees, or independent contractor, during the years 1950 to 1979, not previously identified as such in your response to this letter.
 - a. Provide the dates of removal of these materials.
- b. Provide the final destination of each removal by Peirce Oil Company.
- c. Provide a list identifying all records and documents pertaining to the removal off-site of these waste materials by Peirce Oil Company. If no such documentation exists, please explain why.
- d. Did Peirce Oil remove any materials containing polychlorinated biphenyls?
- Ans: 4. No records are available at this base that will provide information on disposal of waste oils and lubricants by Peirce Oil Company. From 1973 to 1979, disposal was handled by DRMO. A search of their records has been requested (see attachment 2). Prior to 1973, no records exist on how waste oils and lubricants were disposed of.
- Ques: 5. Provide a list identifying all records and documents pertaining to all waste oil and lubricants removed from your facility during the years 1950 to 1979, not supplied in compliance with any other question contained in this letter. If these records are not available, please explain why.
- Ans: 5. As stated in question #4, no records exist from 1955 to 1973. From 1973 to 1979, records may or may not exist. A request for such information from the DRMO regional office has been made. See attachment 2.
- Ques: 6. Identify the source, composition and volume of any waste oil and lubricants removed by Parent Oil Company or Wally Parent, personally, during the years 1950 to 1979, not previously requested by this letter.
 - a. Provide the dates of removal of these materials.
- b. Provide the final destination of each removal by Parent Oil Company.
- c. Provide a list identifying all records an documents pertaining to the removal off-site of these waste materials by Parent Oil Company. If no such documentation exists, please explain why.
- Ans: 6. In reply to 6a and 6b, no records exist on disposal of waste oils and lubricants from 1955 to 1973. From 1973 to 1979, records have been requested from the DRMO regional office.

In reply to 6d, no records exist from 1955 to 1973 that indicate Parent Oil Company or Wally Parent received PCBs from the base. From 1973 to 1979, records have been requested from DRMO regional office.

- Ques: 7. List by volume and constituent, the amount of any other waste oils and lubricants removed off-site or disposed of on-site per year, during the years 1950-1979, not previously addressed by your answers to other questions contained in this letter.
- a. For waste oils and lubricants removed off-site, list the final destination of each load and the total volume of each.
- b. Provide the names and addresses of each transporter of these loads.
- Ans: 7. In reply to 7a and 7b, see question #4 response.
- Ques: 8. Identify by name, address and telephone number, all transporters involved in the removal of waste oils and lubricants from your facility during the years 1950 to 1979, not previously addressed in your response to this letter.
- Ans: 8. See question #4 response.
- Ques: 9. Identify the name and address, all sites utilized by your facility for off-site shipment of industrial wastes during the years 1950 to 1979, not previously addressed in your response to any other question contained in this letter.
- a. This information should include the amount and types of wastes sent to these facilities and the dates of shipment.
- Ans: 9. No records exist from 1955 to 1973 on the type, amount, and disposal site used for industrial wastes. From 1973 to 1979, disposal was handled by DRMO. Records for this period have been requested from DRMO regional office.

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

I certify that the foregoing answers to the EPA Request for Information are true, complete, and accurate to the best of my information and belief and that any documents submitted herewith are true, complete, and authentic to the best of my knowledge and belief.

GARY L. HICKS, Colonel, USAF

Commander, 380 Combat Support Group